



1 Nick Mirr  
2 Federal Defenders of Eastern Washington and Idaho  
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6 Attorney for Joel Solorio Espino

7  
8 United States District Court  
9 Eastern District of Washington  
10 Honorable Lonny R. Suko

11 United States,

12 Plaintiff,

13 v.

14 Joel Solorio Espino,

15 Defendant.

16 No. 1:17-CR-2040-LRS

17 Motion to Continue Supervised  
18 Release Revocation Hearing

19 June 22, 2022 – 6:30 p.m.

Without Oral Argument

1       Joel Solorio Espino, by and through his attorney, Nick Mirr, for the Federal  
2 Defenders of Eastern Washington and Idaho, hereby moves this Court for an order  
3 continuing the supervised release revocation hearing currently scheduled for June 22,  
4 2022 at 1:30 p.m. in Yakima.

5           Defense counsel and Mr. Espino have reviewed the allegations set forth in the  
6 petitions and discussed his options going forward. As a result of these discussions, Mr.  
7 Espino has concluded that he would benefit from additional time before appearing  
8 before the Court.

9           Mr. Espino has recognized that he is in need of and would benefit greatly from  
10 substance abuse treatment services, regardless of the outcome of his revocation  
11 hearing. Mr. Espino, therefore, intends to put together a treatment plan with the goal of  
12 entering into inpatient treatment. To that end, Mr. Espino requests additional time from  
13 the Court to enable him to make arrangements, including potentially securing a new  
14 substance abuse evaluation—which can require substantial time when an individual is  
15 in custody and depends upon the schedules of treatment providers. Additionally,  
16 defense counsel will be out of district on the date of the currently scheduled revocation  
17 hearing at a training. For these reasons, Mr. Espino requests the Court continue his  
18 revocation hearing.

1 Defense counsel discussed this motion with United States Probation Officer  
2 Mendoza. Officer Mendoza has indicated that she does not object to a continuance of  
3 between 45 and 60 days nor to the motion being addressed on an expedited basis.  
4 Defense counsel was unable to contact AUSA Hanlon regarding his position despite  
5 several attempts. Accordingly, Mr. Espino requests the Court continue his supervised  
6 release revocation hearing to August 25, 2022, at 11:30 a.m. in Yakima, Washington.

7 Dated: June 10, 2022.

8 Federal Defenders of Eastern Washington & Idaho  
9 Attorneys for Joel Solorio Espino

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16 Service Certificate

17 I certify that on June 10, 2022, I electronically filed the foregoing with the  
18 Clerk of the Court using the CM/ECF System, which will notify Assistant United  
19 States Attorneys: Thomas J. Hanlon.

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